State of Tennessee
Department of Children's Services

Manual for Developing Policies and Procedures

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INTRODUCTION

The Department of Children's Services policies and procedures will be written in compliance with the *American Correction Association (ACA)* accreditation standards for Juvenile Justice Programs, the *Council on Accreditation* (COA) accreditation standards for child and family service and behavioral healthcare, the *DCS Standards of Professional Practice for Serving Children and Families*, and applicable Legislative Mandates, State and Federal Rules and Laws. DCS policies and procedures will be reviewed and revised **annually** or **as often as necessary when practices, procedures, legal requirements or regulations change**.

Policies and procedures will be reviewed and approved by the appropriate program Deputy Commissioner, Executive Director, Director and final approval issued by the Commissioner.

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3	Fiscal Management
4	Personnel
5	Training and Staff Development
7	Information Resources
8	Volunteer Involvement
9	Child Records
10	Prevention Services
11	Assessment
12	Release/ Revocation/ Discharge
13	Probation and Aftercare
14	Child Protective Services
15	Adoption
16	Foster Care
17	Contract Services / Licensing
18	Programs and Services for Residential Programs
19	Mental Health Treatment / Services
20	Health Services
20A	TennCare Services
21	Education
22	Food Service
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24	Rights
25	Rules and Discipline for Residential Programs
26	Communication, Mail, Visiting, and Telephone for Residential Programs
27	Security and Control for Residential Programs
28	Physical Plant
29	Fire, Safety and Emergency Procedures
30	Administrative Services
31	Program Operations
32	Health Insurance Portability and Accountability Act of 1996 (HIPAA)
33	TNKids

Responsibilities of the Departmental Policy Coordinator

The departmental policy coordinator (DPC) will provide assistance for policy development as outlined below:

1. Facilitate DCS staff in policy work group meetings to organize, plan, outline, collaborate and research policy subject matter;
2. Prepare draft policies and procedures in a standard DCS policy format;
3. Collaborate with policy owners on the development of forms or the revision of existing forms and other documents relevant to the policy;
4. Coordinate and collaborate with the DCS Forms and Publications Liaison on the disposition of forms;
5. Revise existing DCS policies and procedures as often as necessary;
6. Coordinate and facilitate the policy review, circulation and revision process. All policy documents for review/revision will be forwarded to each Deputy Commissioner, Executive Director, Director, Regional Administrator, YDC Superintendent and Group Home Supervisor and other employees and persons as applicable;
7. Ensure that policies and procedures review feedback information is disseminated to policy owners and managers for consideration;
8. Ensure policies and procedures have been reviewed for appropriate Standards and State and Federal Laws;
9. Maintain and track policies and procedures, forms and other documents in the review and development process,
10. Maintain information and development files on policies and procedures, forms and other documents in the development stage;
11. Maintain historical files on each approved policy;
12. Annually, develop, maintain and revise **this** manual.
13. Collaborate with the Office of Information Technology, Web Development Services for posting policies, forms and other information to the DCS Intranet/Internet Website;
14. Promptly inform employees of new policies and procedures, revisions and updates;
15. Manage and maintain DCS policies and procedures on the DCS Internet web page;
16. Inform Training Academy and Tennessee Center for Child Welfare staff of new and revised policies as applicable;

Responsibilities of Managers and Supervisory Employees

1. Notify the division of Policy, Planning and Performance Management when there is a need to develop new policy, revise existing policy or form policy workgroups.

2. Forward policy drafts or providing draft instructions to DPC's.

3. Review policy drafts with appropriate program staff for suggestions and feedback and ensure a timely response to the policy review request.

4. Ensure a procedure or process for work site circulation and sign-off or through staff meetings, on-the-job training, communication, interpretation and review of DCS policies and procedures for their employees. (See DCS Policy, ***1.3, Communication, Information Sharing and Work Site Meetings***.) Upon completion of communication, training, interpretation and review, employees will sign form ***CS-0479, Verification of Policy Understanding*** verifying they have:

    a) Read and understand applicable policies and procedures;

    b) Been given an opportunity to ask questions for clarification; and

    c) Been instructed of the location of DCS policies and procedure manuals and other documents at their worksite and/or have received instructions on how to access policies and procedures via the DCS Internet.

5. All training on policies and procedures and other documents (i.e., manuals, work aids, etc.) or revisions made to existing procedures and processes that staff have to be trained on in order to complete their assigned job tasks, must be documented and forwarded to the DCS Training and Staff Development Division for appropriate training credit.

CHAPTER 1

Policy Content

The ***DCS Policy Document Template CS-0001*** is the official form template used for creating DCS policies and procedures. This form/template is not available electronically and must be obtained from the Departmental Policy Coordinator (DPC).

Section Headings

The following is a description of the contents and formatting instructions for the sections in the policy document template:

1. ***Policy Index Number*:** The policy index number is typed in the *footer* and *header* of the policy. The policy number is comprised of the corresponding policy chapter and a number, i.e., *13.1- "13"* denotes the DCS Policy Chapter; "1" denotes the assigned number. Additional policy chapters (other than those listed on page 1 of this manual) may be established by the DPC as the need arises.
2. ***Subject*:** The designated policy title. Policies are identified by an index number at the top of the page. Only the Departmental Policy Coordinator (DPC) can assign the policy index numbers.
3. ***Approval*:** The Commissioner will officially approve all departmental policies by original signature. Until the Commissioner officially approves the policy by original signature, this space remains blank.
4. ***Authority*:** The legal authority by which the policy is issued is listed in this section and must be approved by legal staff. Always include the TCA codes referencing the powers of the department, i.e., *TCA 37-5-105; 37-5-106*. Questions or information for this section must be directed to the DCS legal counsel.
5. ***Standards:*** Applicable standards associated with the policy.
6. ***Application*:** This section lists the general grouping of employees, persons or groups to whom the policy is directed and the group of employee or persons most specifically affected by the document. If children/youth or families are to be allowed access to policy, they must be listed here also. Position titles listed in the application should be capitalized for *emphasis*. If possible, use "*Employees*" instead of "*Staff*."

> ***Example*:**
>
> ***Application***
>
> To All Department of Children's Services Child Protective Services Employees

8. ***Policy:*** The American Correctional Association (ACA) defines policy as a "*definite, stated course or method of action adopted and pursued by an agency which guides and determines present and future decisions and actions of that agency*."

   The Council on Accreditation (COA) defines policy as "*written statements of principles and positions approved by the governing body of the organization that guide organizational operations and services*.

   The policy statement is the focal point of the policy. It should appear in the form of a complete sentence, ending with a period, and be brief, clear, and concise. Use the verb ***shall*** or ***will*** to express the Department's intent. *Shall* denotes a mandatory requirement.

It is imperative that policy statements and procedural statements not be perceived as synonymous. Policy statements declare "**what** and "**why**" the intent/goal of the Department; they never contain "who, how, when, or where" information. Procedures do not state the broad intent/goal of the Department; they explain the "**who**, **how**, **when**, or **where**" through which the policy is carried out**.**

***Example*: *Policy Statement*:**

DCS shall maintain a child welfare management information system (TNKids) to receive reports alleging child abuse or neglect and ensure that accurate, relevant, and timely data is provided to field staff, supervisors and management.

9. ***Purpose*:** A brief statement of why the policy is needed.
10. ***Procedures*:** Procedures **must describe *who, how, when,*** and **where the policy statement is to be implemented**. Procedures are brief; together they describe the general **sequence** of events necessary to implement the policy. They should direct actions to be taken in a particular situation to perform a specific task within the guidelines of the policy. Policy statements are never placed in the explanations of procedures, and procedures exist only to give a ***method*** for carrying out the policy statement. Procedures are action oriented. Procedures also frequently point out the consequences of failure to comply, such as damage, loss, injury, or discipline. Clearly stated consequences help users understand (1) the seriousness of the matter and (2) their responsibility for it.
11. ***Forms*:** Under this heading list all current forms that are used for carrying out the procedures of the policy. If there are no forms, indicate "none." Forms will be linked to the forms web page. (Review DCS policy ***7.17 Forms Management***.)

***Example - Forms*:**

CS-0130, Return to Home Placement

12. ***Collateral documents***: This section lists procedure manuals, work aids or other documents that relate to the policy. These documents may be linked for easy access to the documents.

Example - Collateral Documents:

Individual Program Plan Manual
Permanency Plan Manual

13. ***Glossary***: Glossary items will be displayed throughout the policy document in **green** font and will be placed at the end of the policy document. Definitions of key words in policies are also compiled into a departmental Glossary housed on the DCS Intranet. Policy authors and reviewers must inform the DPC of any important terms that need to be defined in the policy and those that are not already defined in the glossary.

14. ***Original effective date*****:** This is the date on which the policy was implemented and the original effective date of the policy. This date will remain on the policy for the life of the policy. Use the date format of "**00/00/00**."

15. ***Current effective Date*****:** This is the date that the policy was revised and is the most current effective date of the policy. The "*Current effective date*" will change each time the policy is revised. Use the date format of "**00/00/00**."

    Revised policies will not be given a new revised date if there are **minor** revisions (no more than three (3) sectional changes and consists of minor editing or "*word-smithing*") within three (3) months of the most recent effective/revision date, unless there are **major** revisions to the procedures. Major revisions consist of revisions that will affect practice and/or training on content and consist of substantial changes throughout the procedures that may require a policy rewrite and may be routed through the policy review process at the discretion of the policy owner/responsible staff.

16. ***Supersedes*****:** (Definition: *To take the place, room, or position of; Replace*) List superseded policies and their effective dates.

Helpful hints for writing procedures: *(Adapted from* *Writing Effective Policies and Procedures* *by Nancy J. Campbell)*

1. Use active voice, present tense

Place procedures in the sequence in which they should be accomplished by using active voice, present tense. The shortest, clearest, most powerful message you can send in the English language is in active voice, present tense. Compare the following:

- ♦ *Case Managers must complete form CS-1234 within ten (10) days.*
- ♦ *Form CS-1234 must be completed by case managers within ten (10) days*.

In the second sentence, passive voice lengthens and makes it harder to figure out who's responsible for the action. The "who" now comes at the end of the sentence instead of the beginning and when you switch to a verb tense other than present (the most common is future tense), you also add length.

The most significant problem with future tense is that it implies the action must be taken *sometime*, where present tense implies immediacy. Stay with active voice and present tense most of the time. Note: There are some exceptions. Certain procedures, such as software instructions, use passive voice to avoid endless repetition of "you" or "the operator."

When stating to who this policy applies or who is to implement a procedure, make sure that the personnel listed have the authority to implement all the procedures.

2. Clearly identify the level of priority

Clearly identify the level of priority and responsibility ascribed to a procedure by making the following distinctions:

a) Procedures that are absolutely required—use the verb, ***must***

b) Procedures that describe best practice but are not absolutely required—use the verb, ***should***

c) Steps simply stating the sequence of events—use the simple present tense of the action verb (for example, "the court ***reviews*** all documentation").

d) Steps that are at an employee's discretion (such as choices or options)—use the verb, ***may***

3. Use standard word order

Standard word order is active voice: subject-verb-object. It's standard precisely because it's the shortest, clearest way to convey a direct message. In policies and procedures, it is often best to make the subject an “implied” subject (leave it out and start with the verb.) Both of the following sentences use standard word order, but the second sentence shortens by using an implied subject and starting with an action verb.

- *Employees submit their timesheets bi-weekly.*
- *Submit timesheets bi-weekly*.

The minute you deviate from standard word order, you begin to lengthen and generally add padding. Some variation in word order is desirable to prevent monotony. The problem is that we tend to get carried away with it and add too many fancy phrases and clauses, too much passive voice and future tense. The bulk of your writing should use standard word order.

4. Use parallelism

Parallelism is a form of consistency that creates a rhythm in the document. It simply means using the same grammar construct for like items. Consider this nonparallel example:

- *Read the document, be sure to sign it, and then it must be returned to Personnel*.

Nonparallel writing sounds awkward and stops the reader. It breaks the rhythm. Find the key concepts and put them into the same format. Use the same parts of speech (verb with verb, noun with noun). Use words or phrases of approximately the same length. The rhythm returns and the sentence is shorter:

- *Read the document, sign it, and return it to Personnel.*

Use parallelism in sentences, paragraphs, lists, and headings. It applies everywhere and is one of the most important elements in making a document easy to read.

5. Be Consistent

Pick a few good verbs and nouns, and then use them consistently. It may violate your vocabulary training, but it helps readers feel comfortable. They hate seeing a new word every time. It’s just one more thing to cope with unnecessarily. Repetition of familiar, useful words increases both comprehension and speed.

6. Use short words and acronyms

If possible stick with words of one or two syllables. Short means fast and easy for the reader.

Acronyms (a word formed from the initial letter or letters of each of the successive parts or major parts of a compound term or name) may be used providing that the first occurrence of the word or name is spelled out followed by the acronym, after which the acronym may be used throughout the remainder of the policy.

Example: Department of Children's Services (DCS)

7. Use common words

Don't get fancy. We really don't *utilize* the hammer, we *use* it. Common words are common for a reason: They work. Everyone understands them. They're fast and easy and they are usually short.

8. Use short sentences

The absolute maximum is twenty words, but even that's pretty long for this type of writing. If possible, aim for a maximum of fifteen words per sentence; then, even if you occasionally run over, you're still OK. Short sentences help make sure that you're using standard word order and that you're not using too many extra clauses.

9. Use short paragraphs

Use a maximum of one hundred words. Long paragraphs create a heavy, gray look that turns the reader off. If it looks long and complicated, readers assume it is.

In procedures, average paragraph length should be much shorter- forty words or fewer.

10. Use lots of lists

Lists are a policy and procedure writer's bread and butter, a staple. They shorten, they force you into good habits such as active voice, and they encourage parallelism. They're also easy on the reader's eye because they indicate a flow and create lots of blank space on the page. Readers love lists. Writers should love lists. The whole world loves a good list.

11. Write as you speak

This is probably the best way to avoid pompous language and windy phrases. But old habits keep telling you that it's not good enough to go on paper. In most cases, it's exactly what you do want on paper: simple, clear, to the point, and understood by everyone. Pretend a user has stopped by to ask you how to do something, then answer (yes, it's OK to talk to yourself). Write it down just as you would say it. Then edit out the words or phrases that seem too informal or trendy.

It's a lot easier to edit up from the spoken work than to edit down from the pompous language.

12. Get rid of wordy phrases

We use them out of habit:

- *In an effort to…*
- *In the event that…*
- *In the eventuality of…*

A lot of this comes from the increasing use of legalisms in our society. A lot of it also comes from that old habit of trying to please the teacher with more words. Ditch these phrases!

13. Get rid of pompous language

Quit trying to impress. It does exactly the opposite. It sounds stuffy and overbearing and turns people off. No one really talks about “*commercially hired rental vehicles*.” We talk about “*rental* cars.” Come down to earth.

14. Get rid of flabby language

Flabby language is just too much of a good thing. Where one adjective would do, we use three: “Use the proper, designated, authorized form.” It’s as if someone found the word trough and couldn’t stop gorging. There are so many adjectives that the main idea gets lost. Remember to think in ones: One is better than two, and two is better than three. Avoid excess.

15. Watch the adjectives

This is where a lot of the flab sneaks up on you. Adjectives are fun. They let you get creative and expressive. Unfortunately, that’s not what your readers are interested in. Speed and clarity, not creativity and flowery description, are the goal. Keep an eagle eye on the number of adjectives.

16. Get specific

One way to avoid flabby language is to be specific. Replace general descriptors with specific references:

- *“Use Form CS-0001”*

  Not
- *“Use the appropriate request form”*

(Identify by number and title all DCS forms used in a procedure.)

Reference to times(s) and locations(s) must be specific:

- *“Within one hour”*

  Not
- *“As soon as possible”*

Identify specific modes of communication:

- (*letter, telephone, FAX, e-mail, etc*.)

17. Get rid of empty phrases

Empty phrases are usually found at the beginning of sentences or clauses:

- *There are…*
- *It is…*

It’s OK to use them occasionally, but they often serve no purpose.

18. Watch out for

Weasel words are words that sound as if you’re trying to wiggle

weasel words

out of a commitment:

- *Part A ought to fit into Part B*.

Not likely to inspire much confidence in the reader, is it? Weasel words tend to destroy credibility. Most common are words like:

Could
May
Might
Most of the time
Ought to
Probably
Should
Try
Usually
Would

19. Use weasel words for flexibility where appropriate

Weasel words aren't always bad. They can make statements elastic. Many policy statements in particular need to retain flexibility. Such statements are intended to cover normal operating conditions, not every conceivable circumstance that may arise. Rather than try to spell out everything, which is impossible, summarize those other circumstances.

20. Avoid turnoffs

Some words and phrases just make people mad. They include:

Absolutely
Always
Delinquent
Fail
Never
Obviously
Of course
Persist
Terminate
Tolerate
Unfortunately

Any word or phrase that's rigid or sounds like a parent disciplining a child will turn readers off.

21. Avoid redundancies

We're in the habit of using so many words that we don't realize we're repeating ourselves unnecessarily. "Advance planning," for instance. How can you plan for the past? "Almost perfect." Really? "Reread again." Hmmm…Remember your new status as a word miser and get rid of these nonsensical phrases.

22. Conquer problem words

Everybody has some word pair that's always been a puzzler. Is it *affect* or *effect*? *Lie* or *lay*? *Ensure, insure,* or *assure?* See the list of problem words on page 50.

23. Watch out for jargon

Jargon is simply language that's specialized for an organization or field. It saves time and space for people who are in the know. The danger is that some readers may be left out. So simplify. If there's any way to write it in plain language, do. Remember that even if jargon doesn't confuse, it usually lengthens.

Note: This depends, too, on the audience. If the policy or procedure is for chemists in a laboratory, they're expecting the jargon. They want and need it, so use it.

24. Use transitional words and phrases at the start of sentences and paragraphs

These words give readers an instant clue about what's coming. They serve two functions: speed and preparation. When readers see the word "and," they know the paragraph is a continuation. If they see "but," they know an exception is coming. If they see "finally," they know the discussion is winding up. In a split second, you've given them the chance to prepare themselves mentally for the content ahead.

Ignore the old rule that said you should never start with a transitional word like "and." Remember, that's the rule for narrative writing. Ditch it in favor of speed and clarity. See the list of transitional words and phrases in the appendices of this manual.

25. Use one-sentence paragraphs

We all know the old rule said never to do this. Forget that rule. One-sentence paragraphs draw instant attention and help you isolate the most important statements in the policy and procedure:

- *Any violation of safety rules is grounds for immediate dismissal.*

It's hard to miss the message.

26. Limit the number of clauses and phrases

Clauses and phrases are dangerous. Used in moderation, they provide needed variety. But they're a little like rabbits: Turn your back and they seem to multiply in seconds. One phrase turns into three or four. Too many clauses and phrases are a dead giveaway that your sentences are too long and complicated. One, maybe two is OK. Anything more than that is highly suspect.

27. Keep clauses and phrases short

You may occasionally need a lengthier clause of ten words or so. But the general rule is five words or fewer.

28. Start with a verb

Readers want to know what they're supposed to do or know, so tell them with the very first word. This also helps eliminate long sentences, excess clauses, passive voice, inverted word order, and wordy phrases:

> *A written request for a leave of absence, stating the specific reason, the duration of the leave, and the expected beginning and ending dates of the leave, should be submitted to your supervisor for approval.*

Whew! Readers who make their way through that deserve a medal. *Look for the verb.* Here it's "submit." Restructure the procedure around that and look what happens:

> *Submit a written request for leave to your supervisor. Include the following information:*
>
> - *The reason for the leave.*
> - *The length of the leave*
> - *The beginning and ending dates of the leave.*

29. Avoid negative wording

Grammatical negatives make the message harder to understand;

- *Users should not be concerned if they are unable to meet these requirements without assistance.*

Is there an interpreter in the house? Grammatical negatives are opposites. They twirl readers around and point them in the other direction. Do it too often and users get dizzy. Focus on what you want them not to do.

> *Note*: Negatives are perfectly legitimate words when used sparingly and properly. They convey important information clearly:
>
> - *Do not add oil.*
> - *Do not wait to submit your claim.*

The goal is to avoid misuse and over use.

30. Avoid misplacement

Misplaced words, phrases, or sentences change the meaning. They can be merely frustrating, but they can also be harmful. What does "it" refer to here?

- *When adjusting the valve in the engine, be sure it is shut off*.

31. Use gender-neutral language

The great sexism debate still rages. Some readers are highly offended by the use of "he" and "she." Others think it's all a tempest in a teapot. Still, it's a sensitive issue that reduces the document's credibility and increases reader resistance. It can also become one more point in a legal debate. Err on the conservative side.

Examples:

- *The manager submits his request,*

But

- *Managers submit their requests,*

- *When the employee requests her leave…*

But

- *When the employee requests leave…*

- *The case manager may submit a claim at any time. He may also submit a secondary claim as needed,*

But

- *The case manager may submit a claim at any time. One may also submit a secondary claim as needed,*

Or

- *The case manager may submit a claim any time. The case manager may also submit a secondary claim as needed.*

32. Use an appropriate level of detail

How much do you really have to tell the reader? It depends solely on the audience and the purpose of the policy or procedure. If you have varied experience levels, you need more detail. If everyone is a Ph.D. in chemistry, you may need less detail. Analyze your audience carefully.

33. Use an appropriate reading level

A good range for policies and procedures is sixth- to eighth-grade reading level. This is roughly the same range used by most newspapers, and your purpose is much the same as theirs: speed and clarity. Reading level is basically a matter of simplicity. The shorter the words and sentences, the lower the reading level and the faster users can read.

34. Analyze the audience

You have users and readers. You have experience and inexperience in both groups. Education, background, and expectation level may vary widely. Who your audience is, and what they're used to, helps you decide questions such as reading level, level of detail, and jargon.

35. Remain impartial

This may sound odd, but what happens if you have to write a policy or procedure you strongly disagree with? Your writing tends to reflect your disagreement. The tone becomes harsh and judgmental, short and choppy, or perhaps long and flowery in an attempt to cover up the disagreement. It's perfectly OK to disagree. Work to change the policy or procedure if you want.

36. In procedures, use one action per step

Procedures require special clarity. A misunderstanding can turn deadly. Limiting each step to one action ensures that the reader gets the message clearly. Look for the action verbs, then list one per step.

37. In procedures, start with the verb

Procedure users want to know only two things: **steps and sequence**. Tell me what to do and in what order. Action verbs get to the heart of the matter and eliminate excess wording- no more searching. Use the more than one hundred common verbs in the verb bank in the appendices of this manual.

38. In procedures, assign the action

Don't assume that people know who's responsible at each step. Clarify by adding titles. Avoid pronouns. (Who is that ubiquitous "they," anyway?) If a single actor will complete the entire process, you only need to identify the responsible party once. But many policies and procedures require at least some interdepartmental activity. When responsibility shifts, make it clear.

It is not necessary to capitalize or otherwise emphasize position titles in the procedures section unless it has been requested. Be specific throughout the policy. Personal names must never be used in a policy and procedures.

39. In procedures, pack a sentence

This is a good technique for warnings and cautions. Put the punch where people will remember it most: at the beginning and end of the sentence. Example 2 is much stronger because the sentence was packed:

- ♦ *During repairs, there is a danger of electric shock if the power is not turned off.*
- ♦ *Turn off the power during repairs, or you may receive an electric shock*.

40. Within procedures, be consistent in formatting when making references to forms, manuals, and other policies

Identify by number and title all DCS forms used in procedures. Italicize to show emphasis. Be consistent throughout the policy:

- ♦ ***CS-1234*, *Type Title of Form After Form Number***

When making references to other manuals within procedures, underline the manual title for emphasis. Be consistent throughout the policy.

Example:

- ♦ Manual for Developing Policies and Procedures

When making references to other policies within the procedures:

Example:

- ♦ ***DCS Policy 1.4, Incident Reporting***

Design considerations: Tips on design for maintaining on-line policies and procedures - *(Adapted from Writing Effective Policies and Procedures by Nancy J. Campbell)*

1. Use small blocks of text	Scrolling through screen after screen of unbroken text makes it seem as if the policy or procedure is endless. The same is true for pieces of paper, but the effect is exaggerated on a screen. Keep sentences and paragraphs even shorter then normal. If possible use short, simple words.
2. Use lots of white space	In addition to small blocks of text, leave plenty of white space in margins. Separate graphics and text distinctly. Because the screen is harder on the eye than a piece of paper, you have to work harder so the reader can use it without straining.
3. If colors are used, limit colors to two (2)	If colors are used in the procedures, too many colors overwhelm the eye in the small space of a screen. Limit colors to two in both text and graphics.
4. Keep graphics simple	The contradiction here is that wonderfully complex graphics can be created on the computer, but they probably can't be used in an on-line system. They create visual clutter. Simplicity is the key to keeping the readers' attention.
5. Use hypertext	Hypertext (*i.e., "linking"*) is the ability to click on a highlighted word or phrase and instantly access related or supplementary material. It's a tremendous improvement over thumbing through hundreds of pages of a manual or even poring over an index or table of contents.
6. If not using hypertext, give clear instructions on how to find related material	Hypertext is ideal, but if the system does not have the capability, tell users exactly how and where to find related material. Can they type in a word or phrase and do a search? Do they have to scan the index or table of contents? Each system is different, so be sure instructions are clear.

Chapter 2

Policy Development, Review, and Approval Process

Policy Development, Review, and Approval Process

Who may propose/write policies?

DCS managers and employees may propose a new policy or revise an existing policy when there is a need to regulate, direct, or inform and to guide DCS operations and services to ensure compliance with applicable State and Federal laws, rules, mandates and accrediting standards. The appropriate Deputy Commissioner, Executive Director and/or Director will approve all new policies and revisions. If appropriate, the Deputy Commissioner, Executive Director and/or Director may appoint an author(s) or a policy writing team(s) in his/her division relevant to the policy subject to include the Departmental Policy Coordinator (DPC), as needed, to write policies and procedures for the department.

The first draft must be forwarded to the DPC, who will circulate the policy to the appropriate policy reviewers. The policy reviewers are comprised of all Deputy Commissioners, Executive Directors , central office Directors, Regional Administrators, Youth Development Center Superintendents, Group Home Supervisors, select field staff and/or Contract Providers and Legal Counsel and other employees and persons as deemed necessary.

Timeliness

In developing the policies and procedures, the author should be aware of the immediate needs and long-term goals of the department. Writers and reviewers must adhere to time limits; the entire process of drafting the policy, circulating it, and reviewing it, preparing it for electronic distribution should not exceed thirty (**30**) working days.

Annual policy review

DCS policies and procedures will be reviewed/revised annually or as often as necessary when State and Federal Laws/Rules, judicial mandates and/or departmental procedures and processes are revised. Annually, the Commissioner or designee issues a memo to outline the policy review process. These memos must be maintained on file for a period of three (3) years.

How proposed/revised policies are reviewed

1. The DPC forwards the **new draft** or **policy revisions, forms and other pertinent documents** by e-mail to the designated policy reviewers indicating the date by which the review must be returned to the DPC. Forms, other documents and information pertinent to the policy should also be sent for review.

2. The designated policy reviewers will respond with suggestions/comments back to the DPC within seven (**7**) working days. Some reviews may be shorter or longer depending on the circumstances and nature of the policy and at the discretion of the policy owner. Policy reviewers in the field may also send a copy of their responses to their respective Executive/central office Directors.

3. Upon receipt of the reviewer's suggestions/comments, the DPC prepares a historical file for the policy that will contain all comments/suggestions and information pertinent to the policy. The historical policy information is kept on file indefinitely.

4. After the review period, the comments/suggestions are forwarded to the policy author for their review to make a determination which comments/suggestions should be incorporated into the policy. Policy owners may respond back to the regional reviewers regarding comments/suggestions.

5. If substantive changes have been made to the first draft relative to the comments or suggestions, it may be necessary to circulate a 2nd draft policy for review.

6. If the policy cannot be finalized after a 2nd review, it may be necessary to assemble a work group comprised of staff relevant to the policy subject matter to review and finalize the policy.

7. After the review comment/revision process is complete, the DPC will forward the draft policy to the legal division for review before the policy is released to the Deputy Commissioner, Executive Director and/or Director and Commissioner for their final approval. **No policy will be forwarded to the above staff prior to DCS Legal Counsel review**. (In some circumstances policies may initially require the review of the DCS legal counsel rather than later.)

8. Upon completion of review by Legal, the DPC completes a final edit of the policy, review comments, standards, forms, laws and glossary entries. The DPC also ensures that the historical file is in order and that a list of the policy reviewers is included in the file.

9. The DPC forwards the finalized policy to the appropriate Deputy Commissioner, Executive Director and/or Director for approval. After their approval, the policy is forwarded to the Commissioner for **final** approval.

10. The approved policy, forms and other pertinent documents is sent to the appropriate division in Information Technology for posting to the web as applicable. After posting, the DPC notifies staff via e-mail of the new/revised, approved policy.

Chapter 3

Policy Notification, Access and Training

Policy Notification, Access and Training

Notification and access

DCS office locations must provide access to DCS policies and procedures and other DCS documents by providing current policies and procedures manuals and/or appropriate technology for policies and procedures to be accessed by the DCS Intranet/Internet.

DCS employees will be notified of new policies and procedures and updates via e-mail notification. The DCS Director/designee for Child Placement and Private Providers will notify contract providers of all new/revised policies as applicable.

As required by the American Correctional Association (ACA) Standards, all Youth Development Centers will **maintain policies and procedures operational manuals** that are accessible to all employees and the public and will be reviewed annually and updated as needed.

Policy Manuals

At the discretion of the local administrator, policy manuals **MAY** be maintained as applicable. Employees responsible for maintaining policy binders must keep it updated with current policies and procedures. If a policy cannot be obtained electronically, the designated staff person must notify the DPC and/or *Information Technology Help Desk at (615) 741-4636*.

Training

New or revised policies must be made available to staff as soon as possible. Employees may be informed of new policies or policy revisions through a procedure for work site circulation and sign-off or through staff meetings/training sessions, on-the-job training or through formalized training, as applicable. (Refer to DCS policy ***1.3, Work Site Meetings***.)

Verification of training on new/revised policies must be maintained at the work site and documented on form ***CS-0479, Verification of Policy Understanding*** and a copy forwarded to the DCS Training and Staff Development Division for appropriate training credit.

Chapter 4

Policy Revisions, Exceptions and Exemptions

Policy Revisions, Exceptions and Exemptions

Requesting revisions

To request revisions to policies and procedures, the author must submit a draft of the revision to the departmental policy coordinator who will ensure that the request for revision is handled accordingly. If the revision requires a rewrite and review, it will be sent through the normal policy review process as outlined in *Chapter 2*.

Minor revisions should be limited to no more than three (3) sectional changes. Substantive or major revisions (4 or more sectional changes) may require a rewrite. For example, if a policy is outdated or the procedural contents are revised extensively due to a change in practice, the policies and procedures must be rewritten and may be routed through the normal policy review process.

Revision notices must not be used to rescind or delete a policy; rescission of policies must be accomplished through a memorandum submitted to the Commissioner.

Exceptions and exemptions

Some policies may have certain procedures outlined that are not pertinent to a particular DCS region, office, facility or program, therefore an exception or exemption to the policy or certain portions of the policy may be requested by memo to the appropriate Executive Director. After the appropriate Executive Director and staff discuss and agree that an exception or exemption is warranted, the DPC should be notified and draft a memo requesting the exemption or exception of the policy for the Commissioner’s signature and approval. A copy of the memo will be kept in the policy historical file.

Chapter 5

Local Procedures

Local Procedures

Purpose

If local procedures are needed to **expand** a departmental policy, or address a particular subject **not covered** by a departmental policy relevant to the subject matter, the supervisor may formulate local procedures specific to the official DCS policy requirements and local needs.

Formatting

Local procedures will be formatted on form ***CS-0251, Local Administrative Procedures***.

If local directives are needed that do **not** correspond to an existing departmental policy, a standard **memorandum format** may be used.

Local procedures will be submitted to the applicable Regional Administrator, Regional Executive Director, central office Executive Director and/or Director for review and approval.

After approval, **copies** of all approved local procedures will be maintained by the applicable central office Executive Director and the Office of Policy, Planning and Performance Management.

Local procedures numbers and titles must correspond with the *same number and title* as the official departmental policy.

Annual Review

All local procedures must be **reviewed** and **updated** as needed. Annual review must be documented by date and signature of local administrator. The administrator must forward copies to the appropriate central office Executive Director, Director and to the Office of Policy, Planning and Performance Management.

Local Procedures Binder

Facilities or offices with local procedures will be maintained in a binder and labeled, **"Local Procedures."** The appropriate central office Director must maintain a complete, current set of all local directives and procedures/protocols pertinent to his/her division. All local directives and procedures/protocols will be maintained in a centralized location within all DCS offices and facilities.

Chapter 6

Procedure Manuals

Procedure Manuals

Purpose

Procedure manuals are working tools that explain in **detail** the "who, how, when, and where" of certain tasks. They specify local idiosyncrasies in procedural activities that fall within required procedural mandates of the department's official policy.

Procedures must be carefully examined to determine whether a procedure manual is feasible or necessary. If procedures within a policy become too complex and numerous a "manual" may be considered rather than a policy and procedures.

Creation of Procedure Manuals

The process for formulating/updating procedure manuals will be conducted in the same manner as for policies and procedures and/or as outlined below:

- Responsibilities of the Departmental Policy Coordinator and Managers and Supervisors (as applicable to policies);
- Manual content design will be at the discretion of the manual owner with input from Departmental Policy Coordinator;
- Development, review and approval (as applicable to policies)
- Updating and Notification (as applicable to policies)
- Revisions, Exceptions and Exemptions (as applicable to policies)
- Local Directives and Procedures Format (as applicable to policies)

Appendices

- **Guide to Subjects and Verbs**
- **List of Problem Words**

Guide to Subjects and Verbs

The following verb choices will be used in order to state clearly and consistently in DCS policies what the level of responsibility and accountability is for a particular procedure. Please use the following guidelines.

To indicate a…	**Requirement**	**Recommendation**	**Choice**	**Sequence of events**
	The staff member is held accountable for performing these tasks.	Indicates best practice, but the staff member is not held accountable.	The staff member may choose among options.	This procedure is to be expected but DCS policy does not compel it.
Use …	**Shall/Must/Will**	**Should**	**May**	**Does (or the simple present tense of the verb)**
Examples**…**	All Department of Children's Services policies **Shall/Will** be formulated by DCS employees…			
	Managers **Must** ensure that line staff participate in the decision making process.	A written notice and agenda **Should** be sent to the participants prior to the meeting.	Administrators **May** choose to have a succession roster.	The commissioner **Schedules** a meeting with senior manager at least annually.
	The home county case manager **Must** mail a copy of the signed order to the residential case manager and the youth must be returned home on the appropriate date.		A letter **May** be substituted for a face-to-face or telephone contact, but only once per quarter.	The court **Holds** a hearing on such a motion within 3 days of an emergency removal.

Subjects of sentences/active voice constructions

To state clearly and explicitly **WHO** is responsible for a task or procedure, use active voice, which requires that the subject of the sentence be the doer of the verb.

Active voice sentences *USE THESE*	**Passive voice sentences** *DON'T USE THESE*
The **assistant commissioner must forward** a copy of each written description and organizational chart to the director of planning.	A copy of each written description and chart **must be forwarded by the assistant commissioner** to the director of planning.
The **director of planning must make** copies	Copies **must be made** available to all departmental units.

available to all departmental units.	(*by **WHOM**? It's unclear)*

List of Problem Words

(Adapted from Writing Effective Policies and Procedures by Nancy J. Campbell)

Here are some word pairs with similar spellings but with different meanings that are commonly abused, misused, and confused.

accept	to admit or agree; to regard as normal or usual, true, or right; to take in stride [*a verb*]
except	to exclude; an exception to [*a preposition*]
affect	to influence, to pretend [*a verb*]
effect	a result [*a noun*], to accomplish or bring about [*a verb*]
all ready	all is ready; in a state of readiness
already	existing, completed
all right	[*correct form*]
alright	[*incorrect form*]
advise	to offer suggestions
inform	to provide information
between	for two things [*as a general rule*], for three or more items if each item is considered individually
among	for more than two things [*as a general rule*]
biweekly	once every two weeks
semiweekly	twice each week
can	is able to, is capable of
may	has permission to
compliment	to praise; to say something favorable, kind, or flattering
complement	something making up a whole; work in accord with; suit well
continual	repeated frequently, lasts but with breaks or pauses
continuous	without interruption
discreet	prudent, knowing when to be silent
discrete	separate, disunited, discontinued
further	more, additional
farther	distance

fewer	a number
less	a quantity or volume
imply	to suggest or hint [*done by the speaker*]
infer	to surmise or conclude [*done by the listener*]
insure	to protect [*used with finances*]
ensure	to guarantee
assure	to pledge or make safe [*used with people*]
lie	to recline in a prone position [*used with people*]
lay	to put or place [*used with objects*]
like	similar to [*a literal comparison*]
as	in the same degree or amount
precedents	[*plural of* precedent, *meaning* a standard or norm, or a significant event that is a turning point]
precedence	precedes or comes first; takes priority over; comes before
principle	a fundamental law, doctrine, or assumption [*a noun*]
principal	most important or influential [*an adjective*]
regardless	in spite of, without concern
irregardless	[*no such beast- please don’t use it!*]
stationary	solid, unmoving
stationery	a piece of paper
that	[*preposition used with a dependent clause that contains essential information- hint, no commas*]
which	[*prepositions used with an independent clause that contains nonessential information- hint, commas*]
will	to promise, to require to
Shall	to make an absolute promise [a stronger form of *will*]